

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. <u>08-179</u>
v.	:	DATE FILED: _____
ANNISE G. SCATES	:	VIOLATIONS:
CHARREL SCATES	:	18 U.S.C. § 1344 (bank fraud - 30 counts)
SHANDEEA GLORIA WILLIAMS	:	18 U.S.C. § 2 (aiding and abetting)
QUINETTE CANADA	:	Notice of forfeiture
WILLIAM FRAZIER,	:	
ak/a "Bilal,"	:	
a/k/a "Trayvon Scott"	:	

SUPERSEDING INDICTMENT

COUNTS ONE THROUGH THIRTY

THE GRAND JURY CHARGES THAT:

1. At all times material to this indictment, the following banks were financial institutions, the deposits of which were insured by the Federal Deposit Insurance Corporation ("FDIC"):

- a. Fulton Bank, FDIC certificate # 7551;
- b. M&T Bank, FDIC certificate # 588;
- c. Commerce Bank, FDIC certificate # 21140; and
- d. Bank of America, FDIC certificate # 3510-6.

2. From in or about July 2007 through in or about November 2007, in the Eastern District of Pennsylvania, defendants

**ANNISE G. SCATES,
CHARREL SCATES,
SHANDEEA GLORIA WILLIAMS,
QUINETTE CANADA, and
WILLIAM FRAZIER,**

**a/k/a “Bilal,”
a/k/a “Trayvon Scott”**

knowingly executed, and attempted to execute, and aided and abetted the execution and attempted execution of, a scheme to defraud Fulton Bank, M&T Bank, Commerce Bank, and Bank of America, and to obtain monies owned by and under the care, custody, and control of these banks by means of false and fraudulent pretenses, representations, and promises.

THE SCHEME

3. It was part of the scheme that from in or about July 2007 through November 2007, defendants ANNISE G. SCATES, CHARREL SCATES, SHANDEEA GLORIA WILLIAMS, and QUINETTE CANADA cashed and attempted to cash numerous counterfeit, forged, and unauthorized checks at multiple branch offices of Fulton Bank, M&T Bank, Commerce Bank, and Bank of America, located in the Eastern District of Pennsylvania. These counterfeit, forged and unauthorized checks were drawn on accounts at the banks at which defendants cashed and attempted to cash them.

4. It was further part of the scheme that from in or about July 2007 through November 2007, defendant WILLIAM FRAZIER, a/k/a “Bilal,” a/k/a “Trayvon Scott,” provided the counterfeit, forged, and unauthorized checks to defendants ANNISE G. SCATES, CHARREL SCATES, SHANDEEA GLORIA WILLIAMS, and QUINETTE CANADA to cash and attempt to cash at multiple branch offices of Fulton Bank, M&T Bank, Commerce Bank, and Bank of America located in the Eastern District of Pennsylvania.

5. It was further part of the scheme that from in or about July 2007 through November 2007, defendant WILLIAM FRAZIER, a/k/a “Bilal,” a/k/a “Trayvon Scott,” drove

defendants ANNISE G. SCATES, CHARREL SCATES, SHANDEEA GLORIA WILLIAMS, and QUINETTE CANADA to multiple branch offices of Fulton Bank, M&T Bank, Commerce Bank, and Bank of America located in the Eastern District of Pennsylvania to cash and attempt to cash the checks. Defendant WILLIAM FRAZIER, a/k/a “Bilal,” a/k/a “Trayvon Scott,” waited outside of the banks while defendants ANNISE G. SCATES, CHARREL SCATES, SHANDEEA GLORIA WILLIAMS, and QUINETTE CANADA entered the banks to cash and attempt to cash the checks.

6. It was further part of the scheme that from in or about July 2007 through November 2007, defendant WILLIAM FRAZIER, a/k/a “Bilal,” a/k/a “Trayvon Scott,” shared in the proceeds from the cashing of the checks by defendants ANNISE G. SCATES, CHARREL SCATES, SHANDEEA GLORIA WILLIAMS, and QUINETTE CANADA at the multiple branch offices of Fulton Bank, M&T Bank, Commerce Bank, and Bank of America located in the Eastern District of Pennsylvania.

7. On or about the dates listed below, the defendants listed below undertook and aided and abetted the listed fraudulent transaction at a bank in the Eastern District of Pennsylvania.

COUNT	DATE	DEFENDANT	FINANCIAL INSTITUTION	TRANSACTION
1	7/19/2007	SHANDEEA GLORIA WILLIAMS WILLIAM FRAZIER	Fulton Bank	Cashing of \$1,867.98 counterfeit check no. 102799
2	7/19/2007	SHANDEEA GLORIA WILLIAMS WILLIAM FRAZIER	Fulton Bank	Cashing of \$1,867.98 counterfeit check no. 102798

3	7/19/2007	ANNISE G. SCATES WILLIAM FRAZIER	Fulton Bank	Cashing of \$1,765.54 counterfeit check no. 102813
4	7/19/2007	SHANDEEA GLORIA WILLIAMS WILLIAM FRAZIER	Fulton Bank	Cashing of \$1,867.98 counterfeit check no. 102802
5	7/19/2007	ANNISE G. SCATES WILLIAM FRAZIER	Fulton Bank	Cashing of \$1,765.54 counterfeit check no. 102817
6	7/19/2007	ANNISE G. SCATES WILLIAM FRAZIER	Fulton Bank	Cashing of \$1,765.54 counterfeit check no. 102809
7	7/19/2007	SHANDEEA GLORIA WILLIAMS WILLIAM FRAZIER	Fulton Bank	Cashing of \$1,867.98 Counterfeit check no. 102805
8	7/20/2007	ANNISE G. SCATES WILLIAM FRAZIER	Fulton Bank	Attempted cashing of \$1,765.54 counterfeit check no. 102815
9	8/6/2007	QUINETTE CANADA WILLIAM FRAZIER	M&T Bank	Cashing of \$907.41 counterfeit check no. 26360
10	8/6/2007	CHARREL SCATES WILLIAM FRAZIER	M&T Bank	Cashing of \$884.23 counterfeit check no. 26357
11	8/6/2007	CHARREL SCATES WILLIAM FRAZIER	M&T Bank	Cashing of \$849.23 counterfeit check no. 26353
12	8/6/2007	QUINETTE CANADA WILLIAM FRAZIER	M&T Bank	Cashing of \$813.97 counterfeit check no. 26359
13	8/6/2007	CHARREL SCATES WILLIAM FRAZIER	M&T Bank	Cashing of \$1,027.82 counterfeit check no. 26352
14	8/6/2007	QUINETTE CANADA WILLIAM FRAZIER	M&T Bank	Cashing of \$1,024.87 counterfeit check no. 26358

15	8/6/2007	CHARREL SCATES WILLIAM FRAZIER	M&T Bank	Cashing of \$933.01 counterfeit check no. 26354
16	8/6/2007	QUINETTE CANADA WILLIAM FRAZIER	M&T Bank	Cashing of \$887.94 counterfeit check no. 26356
17	8/7/2007	ANNISE G. SCATES WILLIAM FRAZIER	M&T Bank	Cashing of \$986.03 counterfeit check no. 26378
18	8/7/2007	CHARREL SCATES WILLIAM FRAZIER	M&T Bank	Cashing of \$920.39 counterfeit check no. 26374
19	8/7/2007	ANNISE G. SCATES WILLIAM FRAZIER	M&T Bank	Cashing of \$979.53 counterfeit check no. 26381
20	8/7/2007	CHARREL SCATES WILLIAM FRAZIER	M&T Bank	Cashing of \$972.43 counterfeit check no. 26373
21	8/7/2007	ANNISE G. SCATES WILLIAM FRAZIER	M&T Bank	Cashing of \$981.40 counterfeit check no. 26376
22	8/23/2007	CHARREL SCATES WILLIAM FRAZIER	Fulton Bank	Attempted cashing of \$901.49 counterfeit check no. 1811
23	9/18/2007	ANNISE G. SCATES WILLIAM FRAZIER	Commerce Bank	Cashing of \$989.43 counterfeit check no. 812
24	9/18/2007	CHARREL SCATES WILLIAM FRAZIER	Commerce Bank	Cashing of \$988.39 counterfeit check no. 810
25	9/18/2007	ANNISE G. SCATES WILLIAM FRAZIER	Commerce Bank	Cashing of \$1,180.00 counterfeit check no. 805
26	9/18/2007	CHARREL SCATES WILLIAM FRAZIER	Commerce Bank	Cashing of \$1,180.00 counterfeit check no. 804

27	9/18/2007	CHARREL SCATES WILLIAM FRAZIER	Commerce Bank	Cashing of \$983.47 counterfeit check no. 814
28	9/18/2007	ANNISE G. SCATES WILLIAM FRAZIER	Commerce Bank	Cashing of \$989.43 counterfeit check no. 807
29	9/18/2007	CHARREL SCATES WILLIAM FRAZIER	Commerce Bank	Attempted cashing of \$986.07 counterfeit check no. 806
30	11/14/07	WILLIAM FRAZIER	Bank of America	Attempted cashing of \$993.82 counterfeit check no. 114348

All in violation of Title 18, United States Code, Sections 1344 and 2.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 1344, set forth in this indictment, defendants

**ANNISE G. SCATES,
CHARREL SCATES,
SHANDEEA GLORIA WILLIAMS,
QUINETTE CANADA, and
WILLIAM FRAZIER,
a/k/a “Bilal,”
a/k/a “Trayvon Scott”**

shall forfeit to the United States of America any property that constitutes, or is derived from, proceeds obtained directly or indirectly from the commission of such offenses.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 982(a)(2).

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney